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August 7, 2025

SUBMITTED VIA E-FILE

The Honorable Leonard P. Stark
U.S. Court of Appeals for the Federal Circuit
717 Madison Place, NW
Washington, D.C. 20439

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*,
D. Del. No. 1:17-mc-00151-LPS

Dear Judge Stark:

I write on behalf of PDV Holding, Inc. (“PDVH”) and CITGO Petroleum Corporation (“CITGO”) regarding the sealed version of Exhibit 55 attached to the Supplemental Declaration of Nathan P. Eimer in Support of the Venezuela Parties’ Response to Objections to the Special Master’s Final Recommendation, submitted contemporaneously to the Court today. In accordance with the Court’s July 14 Order, CITGO and PDVH conferred with the Special Master regarding his position on the confidentiality of material in the Venezuela Parties’ filings. His counsel advised that the Special Master did not request anything from the Venezuela Parties’ filings be sealed but indicated that the CITGO and PDVH should confer with Red Tree Investments LLC and the 2020 Bondholders regarding any requests for redactions they may have. CITGO and PDVH promptly did so and, in “compl[iance] with the Special Master’s directives,” have filed Exhibit 55 under seal pursuant to the requests of those entities. D.I. 1887. Exhibit 55 is the May 14, 2025 Transaction Support Agreement associated with Red Tree’s topping period bid. CITGO and PDVH will file a redacted version of Exhibit 55 today that adheres to the requests of Red Tree and the 2020 Bondholders and mirrors the redactions applied to an earlier iteration of the Transaction Support Agreement (D.I. 1627-1).

CITGO and PDVH take no position on whether Exhibit 55 should remain partially sealed at this time, but expect that the Special Master’s forthcoming status report on hearing procedures (to be filed on August 11, 2025 (D.I. 1930)) will address the procedure for the use of sealed information at the public Sale Hearing.

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Consistent with the Court's July 14 Order, CITGO and PDVH have served unredacted versions of today's filings on parties to this case that have executed the confidentiality agreement at D.I. 1555-1.

Respectfully,

/s/ Alexandra M. Cumings

Alexandra Cumings (#6146)

cc: All Counsel of Record